

LASASSO LAW GROUP PLLC

80 MAIDEN LANE - SUITE 2205 - NEW YORK, NEW YORK 10038 TEL (212) 421-6000 - FAX (212) 421-6006

March 25, 2013

VIA ECF

Honorable E. Thomas Boyle, U.S.M.J.
United States District Court, Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

**Re: Charles v. County of Nassau, et al.
11-CV-2709 (MKB)(ETB)**

Dear Judge Boyle,

I represent Plaintiff in the above-captioned matter. I write to respectfully request that Your Honor schedule a conference in connection with the Court's March 19, 2013 Order, denying Defendants' Motion for Extension of Time to Complete Discovery and certifying discovery complete as of February 7, 2013. *See* Docket No. 29. Defendants consent to this request.

My firm's current circumstances make it imperative that I seek another adjournment on behalf of Plaintiff. I am requesting a conference so I may more fully describe these circumstances, which I have briefly set forth below.

In the second half of last year, my law firm disbanded reducing the firm personnel from three lawyers to one. As the remaining attorney, I inherited numerous issues incumbent to a restructuring as well as a large caseload. Many of these cases, including the instant matter, were handled by my former colleague Joseph Anci. Mr. Anci left the firm in November 2012 while we were displaced from our offices due to Hurricane Sandy. When determining how much time was needed to complete discovery at the time of Plaintiff's last adjournment request, I simply did not appreciate the full extent of the workload I would have due to our restructuring and displacement.

The parties are currently cooperating to ensure that any additional discovery extension granted by the court is met. With regard to discovery, Plaintiff has served his production and the Defendants report that they will make their productions this week. The parties are also coordinating deposition dates in April and May.

Additionally, to ensure that Plaintiff has no further delays, the Plaintiff has recently retained co-counsel, Joseph Conway, to assist on this matter. Mr. Conway won a dismissal and acquittal of charges against Plaintiff in the underlying criminal matter and is, thus, familiar with the facts of this false arrest of and conspiracy against Plaintiff.

For the foregoing reasons, Plaintiff respectfully requests that Your Honor provide us a conference so we may more fully set forth the reasons necessary for a further extension in the discovery deadline. There will be no prejudice to any party.

Respectfully Submitted,


Mariel LaSasso

cc: Joseph Conway
Attorney for Plaintiff Michael Charles
via Email

Peter A. Laserna, Esq.
Attorney for the Nassau County Defendants
via ECF

Keith Corbett, Esq.
Attorney for the Village of Hempstead Defendants
via ECF